



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

July 27, 2016

Ms. Sandra Stevens, Petersburg Deputy District Ranger
USDA Forest Service
Petersburg Ranger District
12 North Nordic Drive
P.O. Box 1328
Petersburg, Alaska 99833-1328

Dear Ms. Stevens:

The U.S. Environmental Protection Agency has reviewed the Final Environmental Impact Statement and Draft Record of Decision for the Kake to Petersburg Transmission Line Intertie Project. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. (EPA Project Number: 14-0046-AFS).

In the Draft Record of Decision, the Forest Service selected Alternative 2, the applicant's Proposed Action. The Forest Service indicated this decision is based upon broadly similar magnitude and types of impacts under all alternatives. The final EIS states that Alternative 4 would involve more Class I and II stream crossings and more use of temporary matting panels than Alternative 2, and that there would be potential conflicts with commercial beam trawl fishery in Duncan Canal with a submarine cable crossing option.

While we agree that the types of impacts are broadly similar among alternatives, we do not agree that the impacts under all alternatives are similar in magnitude. As stated in our February 10, 2015 comment letter on the draft EIS, the analysis of impacts in the EIS indicates that Alternative 4, the Center-South Route, would meet the purpose and need with fewer impacts than Alternative 2. For that reason, we continue to have concerns with Alternative 2, the Northern Route.

The proposed project will require a Clean Water Act Section 404 permit. Per the 404(b)(1) Guidelines, only the Least Environmentally Damaging Practicable Alternative (LEDPA) may be authorized for a Section 404 permit. The Final EIS¹ clearly indicates that Alternative 2 would have greater impacts than Alternative 4 for all of the following aquatic, terrestrial, and wildlife resources:

- Acres of wetlands disturbance, including forested wetlands, moss muskegs, and forested wetland/emergent sedge complex (502 vs. 293);
- Number of Class 1 stream crossings by temporary access spur roads (6 vs. 0);
- Number of Class 2 stream crossings by shovel trail/matting panel (20 vs. 14);
- Overall number of stream crossings (57 vs. 53);

¹ Summary Comparison of Alternatives, Table S-1, p. S-8, Final EIS.

- Acres of Productive Old Growth (POG) forest loss, including high-volume POG, Large-Tree POG, and POG within Beach Fringe and Riparian Buffers (327 vs. 296);
- Acres of disturbance and risk of spread of invasive plants (891 vs. 739);
- Acres of disturbance and miles within unroaded/Inventoried Roadless Areas (396.3 vs. 279.1);
- Acres of new detrimental soil disturbance (110 vs. 89);
- Acres of deep snow winter range loss for deer (15 vs. 7);
- Impacts to scenic integrity and recreation (726 vs. 463);
- Total project length and total project miles on NFS lands (59.9 vs. 51.9 and 48.9 vs. 45.9); and
- Number of structures to be constructed (813 vs. 748).

The listed resource impacts, which would be lower under Alternative 2 than under Alternative 4, are:

Number of Class I stream crossings by shovel trail/matting panel (10 vs. 28);
 Number of Class II stream crossings by temporary access spur (5 vs. 6); and
 Number of Class III stream crossings by temporary access spur (0 vs. 1).

Based on the information provided in the EIS, the only apparent substantially higher impact for Alternative 4 is the number of Class I stream crossings by shovel trail/matting panel. However, shovel trail/matting panel crossings are expected to be lower impact than crossings with spur roads, of which there are six for Alternative 2 and none for Alternative 4.

The Forest Service also points to a concern for commercial beam trawl fisheries in Duncan Canal with use of a submarine cable. However, the KPI project would consider the use of directional boring for the marine crossings associated with Alternative 4 depending on the results of geotechnical studies. If the directional boring option is used, there would be no concern regarding the trawl fishery. A cable crossing could also be marked to alert trawl fishermen to avoid it.

Recommendation: Prepare a 404(b)(1) analysis to determine the least environmentally damaging practicable alternative, and reconsider Alternative 4 as the Kake Intertie route.

Kake Road Project

The Alaska Department of Transportation and Public Facilities (ADOT&PF) and the Federal Highway Administration are no longer actively pursuing the Kake Access Road project as such; however, the FEIS indicates that in 2006 the Forest Service granted to ADOT&PF a 52.6-mile long right-of-way easement from Kake to Petersburg and that the road project is in planning stages.² The Forest Service indicates the Kake to Petersburg road should be considered a reasonably foreseeable project. However, the final EIS does not provide information regarding the route location for the ADOT&PF right-of-way easement, nor whether and to what extent the ADOT&PF right-of-way coincides with the Kake Intertie alternative alignments. This information is relevant to the Kake Intertie NEPA analysis and should be disclosed in the EIS and the Record of Decision.

² FEIS, p. 1-8.

Recommendation: As an addendum to the Final EIS and in the Final Record of Decision, fully describe and map the route of the Forest Service granted right-of-way to ADOT&PF and discuss to what extent it coincides with the Kake Intertie Alternatives and how it may affect the decision.

Climate Change Analysis

We appreciate the informative comparison of the greenhouse gas emissions from diesel generated power vs. power from the SEAPA network, assumed to be from hydropower electricity.³ While the Forest Service identifies no current reasonably foreseeable projects that could be induced by the Kake Intertie project, it may be feasible to inform the analysis by projecting an amount of commercial or other development that is similar to what has been experienced in other areas of southeast Alaska following the provision of relatively low cost power supplies. We suggest this approach be considered for this and future proposed projects.

We appreciate the opportunity to provide comment on the Final EIS and Draft Record of Decision for the Kake Intertie Project, and we look forward to reviewing the Final ROD. If you have questions or would like to discuss our comments, please contact me at (206) 553-1601 or via electronic mail at littleton.christine@epa.gov or contact Elaine Somers of my staff at (206) 553-2966 or via electronic mail at somers.elaine@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Littleton". The signature is written in a cursive, flowing style.

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit

³ FEIS, p. 3-265.